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**PARALEGAL**  
Maria Nunez, B.S.

April 10, 2023


**Via ECF**

Honorable Ronnie Abrams  
United States District Court Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: USA v. Josefina Marine  
Case No.: S3 22-CR- 91(RA)

Motion denied, for the reasons stated by the  
Government in its opposition letter.

SO ORDERED.

  
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Ronnie Abrams, U.S.D.J.  
April 11, 2023

Your Honor:

This office represents Josefina Marine, a defendant in the above referenced matter. We write to request the Court's modification of Ms. Marine's pre-trial release conditions so as to permit the removal of electronic monitoring, the alleviation of "house arrest" and permission for the Defendant to return to her home at 431 W17th Street in Manhattan, New York for the pendency of her pre-trial release.

We have consulted with P.O. Ashley Cosme and she has **no objection** to the requested modifications of conditions. AUSA Micah Fergenson has been advised of this request and the Government has not yet expressed a position hereto.

The Court's consideration of this request is respectfully appreciated. Thank you.

Yours truly,  
*John Russo*  
John L. Russo (JR6200)

Cc: AUSA Micah Fergenson  
PO Ashley Cosme